

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN THE MATTER OF:

**SUPER PET CENTER INC
Debtor(s)**

CASE NO.: 10-08177 (SEK)

CHAPTER 11

SUPPLEMENT TO –OBJECTION TO DISCLOSURE STATEMENT AND

CHAPTER 11 REORGANIZATION PLAN

TO THE HONORABLE COURT:

COMES NOW creditors TANIA DEL LLANO JIMENEZ and IAN DEL LLANO JIMENEZ represented by the undersigned attorney who respectfully set forth and prays:-

INTRODUCTION

1. Last January 9th, 2011, the appearing creditors filed an objection to Debtor's Disclosure Statement and Reorganization Plan. (See docket item # 69). The objection contained language for the reservation of rights to further supplement our objection.

OBJECTION TO DISCLOSURE STATEMENT

2. The appearing party hereby incorporates all objections as previously raised in docket item #69. It is further highlighted and brought to the attention of this Honorable Court, that Debtor's Disclosure Statement only includes outdated information as to the Financial Affairs of the Corporation. Debtor is only disclosing financial information from the year 2008. (See Debtor's Disclosure Statement and Reorganization Plan Exhibits).

3. Debtor has further failed to disclose the fact that the actual management was appointed by the actual stockholders of the corporation. The stockholders of the corporation became

owners because of a settlement converted into judgment in state court case no.: DPE 2007-1532 (503). If full compliance with the settlement is not to be reached, all actions performed by Debtor may be considered “Ultra Vires”, including the order for relief.

4. In view of the foregoing, and in light of the applicable law as previously argued in docket item #69, Debtor’s disclosure statement lacks adequate information, sufficient in detail that would enable a hypothetical investor typical of the holders of claims in the case to make an informed judgment about the plan. See, 11 U.S.C. § 1125.

RESERVATION OF RIGHTS

TANIA DEL LLANO and IAN DEL LLANO reserve the right (a) to amend, supplement, or otherwise modify this objection; and (b) to raise such other and further objections if additional information is obtained.

WHEREFORE, PREMISES CONSIDERED, the appearing creditors respectfully request that this Honorable Court enter an order: (i) sustaining this objection; (ii) denying approval of Debtors Disclosure Statement, (iv) granting the appearing creditors such other and further relief to which they may show themselves to be justly entitled.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the present motion was filed electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the US Trustee, and all participants of CM/ECF System; to debtor's attorneys, LUISA VALLE CASTRO and CARMEN D CONDE TORRES 254 SAN JOSE STREET 5TH FLOOR SAN JUAN, PR 00901-1523, and to all parties in interest as per the attached master address list.

In San Juan, Puerto Rico, on the 18th day of January, 2011.

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